

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In Re: ELIZABETH THOMAS	§	
	§	
	§	
JAMES ALLEN AND ROBERT L THOMAS	§	
Plaintiffs	§	
vs	§	
McCARTHY & HOLTHUS LLP,	§	
ON BEHALF OF FLAGSTONE LENDING	§	
GROUP A NON-EXISTENT A UTAH	§	
CORPORATION, AND	§	Adversary Cause No. 22 AP 03024 Debtor
	§	
SUCCESSOR/ASSIGNEE J.P. MORGAN	§	
CHASE BANK N.A. and ELIZABETH	§	
THOMAS	§	
Defendants	§	
_____	§	
	§	
PRIMARY RESIDENTIAL MORTGAGE INC.	§	
Intervenor/Defendant	§	
vs.	§	
ELIZABETH THOMAS	§	
Defendant	§	

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**DEFENDANT'S EXHIBIT LIST**

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**TO THE HONORABLE COURT:**

**COMES NOW** Colleen M. McClure who hereby provides the following exhibit list  
in Response to the Motion to Reconsider:

**Exhibit** "A" - Docket 54-2 Email Robert Thomas

**Exhibit** "B" - Docket 54-3 Return Email on Motion and Order

**Exhibit**- "C" - Docket 54-4 Order of Withdrawal in 2017-76078 and Consolidated  
Cases

**Exhibit** “D” – Docket 54-5 Response to Motion contesting withdrawal in 2017-76078

**Exhibit** “E” – Docket 54-6 Signed Declaration of Robert L. Thomas in US Southern District Cause No. 19-CV-00323

**Exhibit** “F” – Docket 54-7 Emails from Elizabeth Thomas

**Exhibit** “G” – Docket 54-8 Robert Thomas local address and service address

**Exhibit** “H” – Docket 54-9 UPS tracking information

**Exhibit** “I” – Docket 54-10 Order denying Motion for Relief from Judgment in Cause No. H-19-559

**Exhibit** “J” – Docket 54-11 Thomas Affidavit

**Exhibit** “K” – Docket 54-12 Harris county District Court Docket Sheet

**Exhibit** “L” – Docket 54-13 Emails James Andersen

**Exhibit** “M” – Docket 55-14 Joint Notice of Removal to Federal Court

Colleen McClure has served all documents on Elizabeth Thomas previously with the responses filed. All exhibits relate back to the US Southern District of Texas Docket Number.

Colleen McClure reserves the right to use any potential rebuttal exhibits and any other exhibits filed and attached to responses that have not been specifically stated herein.

Respectfully submitted,

**COLLEEN M. McCLURE**  
**ATTORNEY AT LAW**

By: /s/ Colleen M. McClure

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above foregoing Response has been sent to Robert Thomas and James Allen via email and regular mail on July 29, 2024.

/s/ Colleen M. McClure

**COLLEEN M. MCCLURE**